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Ivan Tapia and Defendants Angela Cruikshank,
12 *Jeff Cruikshank, and Justin Owens*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 INTERNATIONAL MARKETS LIVE INC.,
a New York corporation dba IM MASTERY
16 ACADEMY,

17 Plaintiff,

18 v.

19 DAVID IMONITIE an individual; SPELA
20 SLUGA, an individual; DEVON ROESER,
an individual; IVAN TAPIA, an individual;
21 NVISIONU, INC., a Delaware corporation;
22 ILYKIT, LLC, a Utah limited liability
company, LUCAS LONGMIRE, an
23 individual; NATHAN SAMUEL, an
individual; MICHAEL ZHOR, an individual;
24 IMRAN RICHIE, an individual; JUSTIN
OWENS, an individual; PAULO
25 CAVALLERI, an individual; JOSE
MIGUEL CONTREAS, an individual; BASS
26 GRANT, an individual; ANGELA
27 CRUISHANK, an individual; JEFF
CRUISHANK, an individual; VINCE
28 MURPHY, an individual; GARY
MCSWEEN, an individual; KATRINA

Case No.: 2:22-CV-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME FOR
FILING OF PAPERS RELATED TO
PLAINTIFF'S MOTION TO DISMISS
(ECF NO. 153) (SECOND REQUEST)**

1 WORGESS, an individual; LUIS
 2 RONALDO HARNANDEZ ARRIAGA, an
 3 individual; STEPHANIA AYO, an
 4 individual; SILVIA AYO, an individual;
 5 CATALINA VASQUEZ, an individual;
 6 MATHIAS VASQUEZ, an individual;
 7 DOES 1 through 10, inclusive; and ROE
 8 CORPORATIONS I through X, inclusive,
 9
 10 Defendants.

11 AND ALL RELATED MATTERS

12 **STIPULATION AND [PROPOSED] ORDER**

13 Defendant/Counterclaimant Ivan Tapia (“Tapia”), Counterdefendant Christopher Terry
 14 (“Terry”), (collectively, the “Parties”) by and through their respective undersigned counsel of
 15 record, the law firms of Slighting Law, James Dodge Russell & Stephens PC, Kerr Simpson
 16 Attorneys at Law, and Holland & Hart LLP, hereby stipulate and agree to: 1) extend the deadline
 17 for Tapia to respond to Terry’s Motion to Dismiss (ECF. No. 153; filed 4/18/23); and 2) extend the
 18 deadline for Terry to reply to the response filed by Tapia. This is the second stipulation between the
 19 Parties to extend the time for Tapia to respond to Terry’s Motion to Dismiss and to extend the time
 20 for Terry to reply to Tapia’s response. The Parties hereby specifically agree and stipulate as
 21 follows:
 22

23 WHEREAS, on April 18, 2023, Terry filed its Motion to Dismiss the Counterclaim filed by
 24 Tapia (Motion to Dismiss – ECF No. 153; Counterclaim – ECF No. 44).

25 WHEREAS, on April 25, 2023, counsel for the parties met and conferred via email and
 26 agreed to allow Tapia an additional two (2) weeks of time from the current due dates of May 2,
 27 2023 to file his response to Terry’s Motion to Dismiss, thereby making such response due May 16,
 28 2023.

1 WHEREAS, on April 25, 2023, counsel for the Parties met and conferred via email and
2 agreed to allow Terry an additional two (2) weeks after the filing of Tapia's response to the Motion
3 to Dismiss for Terry to file his reply, thereby making such reply due May 30, 2023.

4 WHEREAS, on May 16, 2023, counsel for the Parties met and conferred via telephone and
5 agreed to allow Tapia an additional one (1) week of time from the current due date of May 16,
6 2023 to file his response to Terry's Motion to Dismiss, thereby making such response due May 23,
7 2023.

9 WHEREAS, on May 16, 2023, counsel for the Parties met and conferred via telephone and
10 agreed to allow Terry an additional one (1) week after the filing of Tapia's response to the Motion
11 to Dismiss for Terry to file his reply, thereby making such reply due June 6, 2023.

12 WHEREAS, no parties oppose the extension of time for the filing of briefing related to the
13 Motion to Dismiss as set forth herein.

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THEREFORE, the Parties jointly stipulate that the Court should enter an order allowing Tapia to file his response to Terry's Motion to Dismiss by May 23, 2023 and for Terry to file his reply to the response by June 6, 2023.

Respectfully submitted, this 16th day of May 2023

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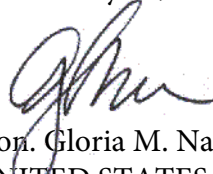
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IT IS SO ORDERED.
 Dated: May 17, 2023.


 Hon. Gloria M. Navarro
 UNITED STATES DISTRICT JUDGE

*Attorneys for Plaintiff/Counterdefendant
 International Markets Live, Inc. and
 Counterdefendant Christopher Terry*

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IT IS SO ORDERED.

Dated: May ____, 2023.

Hon. Magistrate Judge Brenda Weksler
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of May, 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF PAPERS RELATED TO PLAINTIFF'S MOTIONS TO DISMISS (ECF NO. 153)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel:

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